

**FAEGRE DRINKER BIDDLE & REATH LLP**  
JORI M. LOREN (*Admitted pro hac vice*)  
*jori.loren@faegredrinker.com*  
320 South Canal Street, Suite 3300  
Chicago, IL 60606  
Telephone: +1 (312) 356-5116  
Facsimile: +1 (312) 569-3000

NICHOLAS J. BEGAKIS (BAR NO. 253588)  
*nicholas.begakis@faegredrinker.com*  
1800 Century Park East, Suite 1500  
Los Angeles, California 90067  
Telephone: +1 310 203 4000  
Facsimile: +1 310 229 1285

## KING & SPALDING LLP

Geoffrey M. Drake (*Admitted pro hac vice*)  
gdrake@kslaw.com

David Mattern (*Admitted pro hac vice*)  
dmattern@kslaw.com

King & Spalding LLP

1180 Peachtree Street, NE, Suite 1600

Atlanta, GA 30309

Telephone: + 1 (404) 572-4600

Facsimile: +1 (404)

**Attorneys for Defendants  
TIKTOK INC. and BYTE**

TIKTOK INC. and BYTEDANCE INC.

**Additional parties and counsel listed on  
signature pages**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION,

## This Document Relates to:

## *Personal Injury Bellwether Plaintiffs*

Case No. 4:22-MD-03047-YGR

MDL No. 3047

**STIPULATION EXTENDING TIME  
TO FILE OMNIBUS SEALING  
STIPULATION AND/OR MOTION  
REGARDING DECLARATION OF  
JORI M. LOREN IN RESPONSE TO  
MAGISTRATE JUDGE KANG'S MAY  
30, 2025 ORDER**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to the Court's Order Setting Sealing Procedures (ECF No. 341), the Parties submit  
 2 this stipulation extending the time to make an omnibus sealing filing.

3 On June 2, 2025, Defendants filed the Declaration of Jori M. Loren in Response to  
 4 Magistrate Judge Kang's May 30, 2025 Order ("Loren Declaration") (ECF No. 2004). On June 2,  
 5 2025, Defendants also filed a temporary sealing motion pursuant to ECF No. 341 regarding material  
 6 in the Loren Declaration. (ECF No. 2005). Briefing concluded on the Loren Declaration on June 2,  
 7 2025.

8 Section II.C of the Court's Order Setting Sealing Procedures permits the Parties, by  
 9 stipulation, to extend the time to file an Omnibus Stipulation or Omnibus Motion to 21 days after  
 10 the conclusion of briefing. The Parties agree that extending the time to make the omnibus filing is  
 11 appropriate.

12 Accordingly, the Parties stipulate that the deadline to file an Omnibus Stipulation and/or  
 13 Omnibus Motion is extended to June 23, 2025. **IT IS SO STIPULATED AND AGREED**, through  
 14 the Counsel of Record.

15  
 16 Date: June 16, 2025

Respectfully submitted,

17 By: /s/ Lexi J. Hazam  
 18 LEXI J. HAZAM  
**19 LIEFF CABRASER HEIMANN &**  
**BERNSTEIN, LLP**  
 20 275 BATTERY STREET, 29TH FLOOR  
 SAN FRANCISCO, CA 94111-3339  
 Telephone: 415-956-1000  
 lhazam@lchb.com  
 21 PREVIN WARREN  
**MOTLEY RICE LLC**  
 22 401 9th Street NW Suite 630  
 Washington DC 20004  
 Telephone: 202-386-9610  
 pwarren@motleyrice.com  
 23 Co-Lead Counsel

24  
 25 CHRISTOPHER A. SEEGER  
**SEEGER WEISS, LLP**  
 26 55 CHALLENGER ROAD, 6TH FLOOR  
 RIDGEFIELD PARK, NJ 07660  
 Telephone: 973-639-9100  
 cseeger@seegerweiss.com

1 Counsel to Co-Lead Counsel  
2 JENNIE LEE ANDERSON  
**3 ANDRUS ANDERSON, LLP**  
4 155 MONTGOMERY STREET, SUITE 900  
5 SAN FRANCISCO, CA 94104  
6 Telephone: 415-986-1400  
7 jennie@andrusanderson.com

8 Liaison Counsel  
9

10 EMILY C. JEFFCOTT  
**11 MORGAN & MORGAN**  
12 633 WEST FIFTH STREET, SUITE 2652  
13 LOS ANGELES, CA 90071  
14 Telephone: 213-787-8590  
15 ejeffcott@forthepeople.com

16 JOSEPH VANZANDT  
**17 BEASLEY ALLEN**  
18 234 COMMERCE STREET  
19 MONTGOMERY, LA 36103  
20 Telephone: 334-269-2343  
21 joseph.vanzandt@beasleyallen.com

22 Federal/State Liaisons  
23

24 MATTHEW BERGMAN  
25 GLENN DRAPER  
**26 SOCIAL MEDIA VICTIMS LAW CENTER**  
27 821 SECOND AVENUE, SUITE 2100  
28 SEATTLE, WA 98104  
Telephone: 206-741-4862  
matt@socialmediavictims.org  
glenng@socialmediavictims.org

JAMES J. BILSBORROW  
**WEITZ & LUXENBERG, PC**  
700 BROADWAY  
NEW YORK, NY 10003  
Telephone: 212-558-5500  
jbilsborrow@weitzlux.com

JAYNE CONROY  
**SIMMONS HANLY CONROY, LLC**  
112 MADISON AVE, 7TH FLOOR  
NEW YORK, NY 10016  
Telephone: 917-882-5522  
jconroy@simmonsfirm.com

ANDRE MURA  
**GIBBS LAW GROUP, LLP**  
1111 BROADWAY, SUITE 2100  
OAKLAND, CA 94607  
Telephone: 510-350-9717  
amm@classlawgroup.com

ALEXANDRA WALSH  
**WALSH LAW**  
1050 Connecticut Ave, NW, Suite 500  
Washington D.C. 20036  
Telephone: 202-780-3014  
[awalsh@alexwalshlaw.com](mailto:awalsh@alexwalshlaw.com)

MICHAEL M. WEINKOWITZ  
**LEVIN SEDRAN & BERMAN, LLP**  
510 WALNUT STREET  
SUITE 500  
PHILADELPHIA, PA 19106  
Telephone: 215-592-1500  
[mweinkowitz@lfsbalw.com](mailto:mweinkowitz@lfsbalw.com)

Plaintiffs' Steering Committee Leadership  
RON AUSTIN  
**RON AUSTIN LAW**  
400 MANHATTAN BLVD.  
HARVEY, LA 70058  
Telephone: 504-227-8100  
[raustin@ronaustinlaw.com](mailto:raustin@ronaustinlaw.com)

PAIGE BOLDT  
**WALSH LAW**  
4 Dominion Drive, Bldg. 3, Suite 100  
San Antonio, TX 78257  
Telephone: 210-448-0500  
[PBoldt@alexwalshlaw.com](mailto:PBoldt@alexwalshlaw.com)

THOMAS P. CARTMELL  
**WAGSTAFF & CARTMELL LLP**  
4740 Grand Avenue, Suite 300  
Kansas City, MO 64112  
Telephone: 816-701-1100  
[tcartmell@wcllp.com](mailto:tcartmell@wcllp.com)

SARAH EMERY  
**HENDY JOHNSON VAUGHN EMERY PSC**  
600 WEST MAIN STREET, SUITE 100  
LOUISVILLE, KT 40202  
Telephone: 859-600-6725  
[semery@justicestartshere.com](mailto:semery@justicestartshere.com)

CARRIE GOLDBERG  
**C.A. GOLDBERG, PLLC**  
16 Court St.  
Brooklyn, NY 11241  
Telephone: 646-666-8908  
[carrie@cagoldberglaw.com](mailto:carrie@cagoldberglaw.com)

1 RONALD E. JOHNSON, JR.  
2 **HENDY JOHNSON VAUGHN EMERY PSC**  
3 600 WEST MAIN STREET, SUITE 100  
4 LOUISVILLE, KY 40202  
5 Telephone: 859-578-4444  
6 rjohnson@justicestartshere.com  
7  
8

9 SIN-TING MARY LIU  
10 **AYLSTOCK WITKIN KREIS &**  
11 **OVERHOLTZ, PLLC**  
12 17 EAST MAIN STREET, SUITE 200  
13 PENSACOLA, FL 32502  
14 Telephone: 510-698-9566  
15 mliu@awkolaw.com  
16  
17

18 JAMES MARSH  
19 **MARSH LAW FIRM PLLC**  
20 31 HUDSON YARDS, 11TH FLOOR  
21 NEW YORK, NY 10001-2170  
22 Telephone: 212-372-3030  
23 jamesmarsh@marshlaw.com  
24  
25

26 JOSEPH E. MELTER  
27 **KESSLER TOPAZ MELTZER & CHECK**  
28 **LLP**  
29 280 KING OF PRUSSIA ROAD  
30 RADNOR, PA 19087  
31 Telephone: 610-667-7706  
32 jmeltzer@ktmc.com  
33  
34

35 HILLARY NAPPI  
36 **HACH & ROSE LLP**  
37 112 Madison Avenue, 10th Floor  
38 New York, New York 10016  
39 Telephone: 212-213-8311  
40 hnappi@hrsclaw.com  
41  
42

43 EMMIE PAULOS  
44 **LEVIN PAPANTONIO RAFFERTY**  
45 316 SOUTH BAYLEN STREET, SUITE 600  
46 PENSACOLA, FL 32502  
47 Telephone: 850-435-7107  
48 epaulos@levinlaw.com  
49  
50

51 RUTH THI RIZKALLA  
52 **THE CARLSON LAW FIRM, PC**  
53 1500 ROSECRAWS AVE., STE. 500  
54 MANHATTAN BEACH, CA 90266  
55 Telephone: 415-308-1915  
56 rrizkalla@carlsonattorneys.com  
57  
58

1 ROLAND TELLIS  
 2 DAVID FERNANDES  
**3 BARON & BUDD, P.C.**  
 4 15910 Ventura Boulevard, Suite 1600  
 Encino, CA 91436  
 Telephone: 818-839-2333  
 rtellis@baronbudd.com  
 dfernandes@baronbudd.com

5 MELISSA YEATES  
 6 **KESSLER TOPAZ MELTZER & CHECK**  
**7 LLP**  
 8 280 KING OF PRUSSIA ROAD  
 RADNOR, PA 19087  
 Telephone: 610-667-7706  
 myeates@ktmc.com

9 DIANDRA "FU" DEBROSSE ZIMMERMANN  
 10 **DICELLO LEVITT**  
 11 505 20th St North  
 Suite 1500  
 Birmingham, Alabama 35203  
 Telephone: 205-855-5700  
 fu@dicellosevitt.com

12 Plaintiffs' Steering Committee Membership  
 13  
*14 Attorneys for Individual Plaintiffs*

15 COVINGTON & BURLING LLP

16 By: /s/ Ashley M. Simonsen  
 17 Ashley M. Simonsen  
 18 1999 Avenue of the Stars  
 Los Angeles, CA 90067  
 Telephone: (424) 332-4800  
 Facsimile: + 1 (424) 332-4749  
 Email: asimonsen@cov.com

19 COVINGTON & BURLING LLP  
 20 Phyllis A. Jones, Admitted *pro hac vice*  
 21 Paul W. Schmidt, Admitted *pro hac vice*  
 One City Center  
 22 850 Tenth Street, NW  
 Washington, DC 20001-4956  
 Telephone: + 1 (202) 662-6000  
 Facsimile: + 1 (202) 662-6291  
 Email: pajones@cov.com

23  
 24 *Attorney for Defendants Meta Platforms, Inc.*  
*f/k/a Facebook, Inc.; Facebook Holdings,*  
*LLC; Facebook Operations, LLC; Facebook*  
*Payments, Inc.; Facebook Technologies, LLC;*  
*Instagram, LLC; Siculus, Inc.; and Mark Elliot*

1                   Zuckerberg

2                   FAEGRE DRINKER LLP

3                   By: /s/ Jori M. Loren

4                   Nicholas J. Begakis (Bar No. 253588)  
5                   Faegre Drinker Biddle and Reath LLP  
6                   1800 Century Park East, Suite 1500  
7                   Los Angeles, CA 90067  
8                   Telephone: (310) 203-4000  
9                   Facsimile: (310) 229-1285  
10                  Email: nicholas.begakis@faegredrinker.com

11                  FAEGRE DRINKER LLP

12                  Jori M. Loren Admitted *pro hac vice*  
13                  320 South Canal Street, Suite 3300  
14                  Chicago, IL 60606  
15                  Telephone: +1 (312) 356-5116  
16                  Facsimile: +1 (312) 569-3000  
17                  Email: amy.fiterman@faegredrinker.com

18                  KING & SPALDING LLP

19                  Geoffrey Drake, Admitted *pro hac vice*  
20                  1180 Peachtree Street, NE, Suite 1600  
21                  Atlanta, GA 30309  
22                  Tel.: 404-572-4600  
23                  Email: gdrake@kslaw.com  
24                  Email: dmattern@kslaw.com

25                  KING & SPALDING LLP

26                  David Mattern, Admitted *pro hac vice*  
27                  1700 Pennsylvania Avenue, NW, Suite 900  
28                  Washington, D.C. 20006  
29                  Telephone: +1 (202) 626-2946  
30                  Email: dmattern@kslaw.com

31                  *Attorneys for Defendants TikTok Inc. and*  
32                  *ByteDance Inc.*

33                  MUNGER, TOLLES & OLSON LLP

34                  By: /s/ Jonathan H. Blavin

35                  Jonathan H. Blavin, SBN 230269  
36                  MUNGER, TOLLES & OLSON LLP  
37                  560 Mission Street, 27th Floor  
38                  San Francisco, CA 94105-3089  
39                  Telephone: (415) 512-4000  
40                  Facsimile: (415) 512-4077  
41                  Email: jonathan.blavin@mto.com

Rose L. Ehler (SBN 29652)  
Victoria A. Degtyareva (SBN 284199)  
Laura M. Lopez, (SBN 313450)  
Ariel T. Teshuva (SBN 324238)  
MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071-3426  
Telephone: (213) 683-9100  
Facsimile: (213) 687-3702  
Email: rose.ehler@mto.com  
Email: victoria.degtyareva@mto.com  
Email: Ariel.Teshuva@mto.com

Lauren A. Bell (*pro hac vice forthcoming*)  
MUNGER, TOLLES & OLSON LLP  
601 Massachusetts Ave., NW St.,  
Suite 500 E  
Washington, D.C. 20001-5369  
Telephone: (202) 220-1100  
Facsimile: (202) 220-2300  
Email: lauren.bell@mto.com

*Attorneys for Defendant Snap Inc.*

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
By: /s/ Brian M. Willen  
Brian M. Willen (*pro hac vice*)  
WILSON SONSINI GOODRICH & ROSATI  
1301 Avenue of the Americas, 40th Floor  
New York, New York 10019  
Telephone: (212) 999-5800  
Facsimile: (212) 999-5899  
Email: bwillen@wsgr.com

Lauren Gallo White (SBN 309075)  
Samantha A. Machock (SBN 298852)  
WILSON SONSINI GOODRICH & ROSATI  
One Market Plaza, Spear Tower, Suite 3300  
San Francisco, CA 94105  
Telephone: (415) 947-2000  
Facsimile: (415) 947-2099  
Email: lwhite@wsgr.com  
Email: smachock@wsgr.com

1 Christopher Chiou (SBN 233587)  
 2 Matthew K. Donohue (SBN 302144)  
 3 WILSON SONSINI GOODRICH & ROSATI  
 4 953 East Third Street, Suite 100  
 5 Los Angeles, CA 90013  
 6 Telephone: (323) 210-2900  
 7 Facsimile: (866) 974-7329  
 8 Email: cchiou@wsgr.com  
 9 Email: mdonohue@wsgr.com

10  
 11 *Attorneys for Defendants YouTube, LLC and*  
*Google LLC*

12 WILLIAMS & CONNOLLY LLP  
 13 By: /s/ *Joseph G. Petrosinelli*  
 14 Joseph G. Petrosinelli (*pro hac vice*)  
 15 jpetrosinelli@wc.com  
 16 Ashley W. Hardin (*pro hac vice*)  
 17 ahardin@wc.com  
 18 680 Maine Avenue, SW  
 19 Washington, DC 20024  
 20 Telephone.: 202-434-5000  
 21 Fax: 202-434-5029

22  
 23 *Attorneys for Defendants YouTube, LLC and*  
*Google LLC*

24 MORGAN, LEWIS & BOCKIUS LLP  
 25 By: /s/ *Yardena R. Zwang-Weissman*  
 26 Yardena R. Zwang-Weissman (SBN 247111)  
 27 300 South Grand Avenue, 22nd Floor  
 28 Los Angeles, CA 90071-3132  
 29 Tel.: 213.612.7238  
 30 Email:yardena.zwang-  
 31 weissman@morganlewis.com

32 Brian Ercole (*pro hac vice*)  
 33 600 Brickell Avenue, Suite 1600  
 34 Miami, FL 33131-3075  
 35 Tel.: 305.415.3416  
 36 Email: brian.ercole@morganlewis.com

Stephanie Schuster (*pro hac vice*)  
1111 Pennsylvania Avenue NW  
NW Washington, DC 20004-2541  
Tel.: 202.373.6595  
Email: stephanie.schuster@morganlewis.com

*Attorneys for Defendants YouTube, LLC and Google LLC*